

June 1, 2022

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

In Re: **Docket No. 2005-83-A:** Public Service Commission of South Carolina
Administrative and Procedural Matters;

Docket No. 2022-162-E: Procedural Schedule for the Integrated Resource Plans
(IRPs) Filed with the Public Service Commission;

Docket No. 2023-15-E: Dominion Energy South Carolina, Inc.'s 2023 Avoided
Cost Proceeding Pursuant to S.C. Code Ann. Section 58-41-20(A);

Docket No. 2023-16-E: Duke Energy Carolinas, LLC's 2023 Avoided Cost
Proceeding Pursuant to S.C. Code Ann. Section 58-41-20(A); and

Docket No. 2023-17-E: Duke Energy Progress, LLC's 2023 Avoided Cost
Proceeding Pursuant to S.C. Code Ann. Section 58-41-20(A).

Dear Ms. Boyd:

The Southern Environmental Law Center ("SELC") submits these comments in response to the "Notice of Forum Regarding Procedural Schedules in Integrated Resource Plan ("IRP") Proceedings, Avoided Cost Proceedings, and other Procedural Schedules" issued in the above-captioned dockets. SELC currently represents a variety of environmental non-profit clients, including the South Carolina Coastal Conservation League, Southern Alliance for Clean Energy, Upstate Forever, Natural Resources Defense Council, and Sierra Club, in numerous Commission proceedings, and expects to appear on behalf of these or similar clients in many of the 2023 proceedings discussed in the Notice, such as the 2023 utility IRP, fuel cost, and avoided cost dockets. As such, SELC intends to participate in the Forum on June 15, 2022 and appreciates the Commission's request for input on its proposed 2023 procedural schedules.

Generally, SELC has some initial concerns regarding the proposed schedules for the utility IRP and avoided cost proceedings. In particular, there is significant overlap between several of the major utility proceedings, such as the Dominion Energy South Carolina IRP and the 2023 avoided cost proceedings, with the hearings for these dockets scheduled in close proximity. Given the complicated and time-consuming nature of both IRP and avoided cost proceedings, it would be ideal to stagger and spread out the

procedural schedules for these proceedings to the extent possible to avoid testimony deadline conflicts and ensure parties have sufficient time for hearing preparation.

In addition, utility avoided cost filings should ideally be informed by a utility's most recent IRP. However, under the 2023 procedural schedule, each utility's avoided cost proceeding either overlaps with or, for Duke Energy, occurs ahead of its respective IRP proceeding, which could lead to outdated avoided costs that are not in line with the utilities' current IRPs.

In advance of the Forum, SELC plans to conduct further outreach to other parties and potential clients and reserves the right to provide additional comments on the proposed 2023 procedural schedules at that time. SELC also recognizes that it may be difficult to resolve some of these initial concerns due to various statutory deadlines and scheduling conflicts, especially given the Commission's especially full calendar in 2023.

Again, SELC appreciates the opportunity to provide input to the Commission and looks forward to participating in the June 15 Forum. Please do not hesitate to contact us if you have any questions.

Sincerely,

s/Kate Mixson

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CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via first class U.S. Mail or electronic mail with a copy of the Southern Environmental Law Center's *Comments on 2023 Procedural Schedule and Notice of Intent to Participate in Forum*.

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This 1st day of June, 2022.

s/Kate Lee Mixson